ORIGINAL SIGNED BY DR. LARRY TURNER, August 1, 2003

Memorandum

From: Larry Turner, Ph.D.

Environmental Field Branch Office of Pesticide Programs

To: Arthur-Jean Williams, Chief

Environmental Field Branch Office of Pesticide Programs

Subject: No-Effect Determination for Atrazine for Pacific Anadromous Salmonids

Candy Brassard and others have reviewed the available data and other information for atrazine and its potential effects on Pacific anadromous salmonid and their critical habitat. Atrazine was cited by the Washington Toxics Coalition (WTC) as a pesticide they believe warrants review. In addition, atrazine was cited by the Californians for Alternatives to Toxics (CATS) as a pesticide they believe warranted review, with special emphasis on the forestry use of atrazine and the southern Oregon/northern California coho salmon Evolutionarily Significant Unit (ESU), and sudangrass and the California Central Valley steelhead ESU.

We have concluded that atrazine will have no effect on any of the listed or proposed ESUs of Pacific salmon and steelhead. However, because the Consent Decree with CATS requires EPA to formally consult regardless of our determination, we are requesting consultation under section 7(a)(2) of the Endangered Species Act.

Although there is very high usage of atrazine in the midwest, its use is rather low in California with only about 63,000 pounds of active ingredient in 2001 used. We have little information for the Pacific Northwest except that a high percentage of Christmas trees are treated with atrazine, and it has been detected in NAWQA samples from Oregon at nearly 5 ppb. A comparison of the toxicity of atrazine and the likely environmental concentrations derived from standard models indicates that those concentration are below the Levels of Concern for direct and indirect effects on listed salmon and steelhead ESUs. Details are presented in the attached atrazine analysis.

Attachment